

2020 NOV 30 PM 3:18

27 November 2020

To Whom It May Concerns:

BY:

I, the undersigned, have standing as a member of the active lifetime subscribers class (Identifier no. 334CFT9AF3). My subscription predates the merger of Sirius Satellite Radio and XM Satellite Radio, but Defendant has not provided me with an exact date. I estimate that I purchased my lifetime subscription from Sirius Satellite Radio in 2005 or 2006. I have previously objected to *Dover et al v. British Airways, PLC (UK)*, docket no. 1:12-cv-05567 (RJD)(CLP).

1. Defendant's delivery of class action notice by United States Mail is insufficient given the 2018 amendments to Rule 23(c)(2) of the Federal Rule of Civil Procedure, which set forth new uniform standards for class notifications. Considering recent disruptions to the United States Mail, notice should also have been conveyed by electronic mail to all class members.

2. This agreement unjustly enriches Defendant. Defendant failed to disclose the existence of any transfer fee at the time of subscription; having provided no written agreement upon purchase. Further, Defendant downgraded the number of channels lifetime subscribers would receive when it introduced subscription packages (see Exhibits A and B).

3. There is nothing in this agreement that prevents Defendant from engaging in this activity in the future (i.e. no injunctive relief or prospective assurances), which likely will necessitate future litigation. Certainly, this Settlement reduces the improper assessments of similar surcharge to simply a cost of doing business for Defendant.

4. The process for objecting is quite onerous. The long form notice requires that objections be sent to the Settlement Administrator, Settlement Class Counsel, and the lawyers for Defendant. It is unlikely most Settlement Class Members will know to look at the Settlement Agreement itself to locate such addresses, thereby discouraging objections.

I, the undersigned, swear that the foregoing is true under penalty of perjury this 27th day of November 2020.

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Zauberman · Зоberman · ザウバーマン · זאוברמן · زاورمان



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**Billing Summary**[View Details](#)

Balance Due Now: \$0.00	Redeem a Prepaid or Gift Card
Last Payment Amount: \$20.63	Last Payment Date: 11/02/2020
Next Payment Amount: \$20.63	Next Payment Due Date: 12/02/2020

You may be eligible for savings of up to 29% with our Family Discount when you activate another subscription on your account.

[Add a Radio](#)  
[Add Streaming](#)

**Active Radios/Subscriptions**

LTP (Edit Nickname)  
ESN/Radio ID: 013692990631

Audio:  
Sirius Select  
Lifetime Plan

I want to...

Listen to SiriusXM Internet Radio on your Smartphone and computer for only \$5.00 a month.  
[Get it now.](#)

Nissan 2018 (Edit Nickname)  
ESN/Radio ID: QHDW1DCG

Audio:  
SiriusXM All Access  
Username: **sauberman82** (Update Username/Password)  
Monthly Plan - Family Discount  
Subscription renews: 12/02/2020

I want to...

Save \$0.00 on your first year by switching to an annual plan.  
[Start saving now.](#)

Additional minimum subscription, credit card, and shipping required. See Offer Details.



Get it now

**Top FAQs**

I have two or more accounts. Can I combine them?

I'm already a subscriber. Do I get a discount on additional subscriptions?

I want to change my subscription. What should I do?

Is it possible to subscribe to SiriusXM without a radio?

How do I add my new vehicle to my existing SiriusXM account? How do I transfer my existing paid subscription from my old vehicle to my new one?

How do I activate a SiriusXM trial in a vehicle?

What happens to the remaining balance on my SiriusXM Pre-Paid Subscription Card after I pay my bill?



## Hilarious standup and celebrity interviews you'll only hear on SiriusXM.

### STREAMING

### CAR + STREAMING

### CAR + STREAMING

#### Premier

**\$1** for 4 Months

Then \$13 a month.

Fees and taxes apply. See Offer Details below.



Our premium streaming package. Listen on your phone, at home, and online. [View Channel Lineup](#)

- ✓ 300+ channels to enjoy on your phone, at home, and online
- ✓ News, entertainment, comedy, and sports
- ✓ Ad-free music for every genre and decade, plus streaming channels for your party, workout, and more
- ✓ Thousands of shows and videos available on demand
- ✓ Top sports talk and analysis
- ✓ NHL\*, NCAA\* play-by-play
- ✓ NFL play-by-play
- ✓ Create your own stations based on artists or songs you choose
- ✓ Two dedicated Howard Stern channels, including video

**GET PREMIER**

#### Select

**\$5** /mo for 12 Months + an

Amazon Echo Dot

Billed upfront. Then \$16.99 per month.

Fees and taxes apply. See Offer Details below.



All your favorites. Listen in your car, on your phone, or at home. [View Channel Lineup](#)

- ✓ 325+ channels to enjoy in your car, on your phone, at home, and online
- ✓ News, entertainment, comedy, and sports
- ✓ Ad-free music for every genre and decade, plus streaming channels for your party, workout, and more
- ✓ Thousands of shows and videos available on demand
- ✓ Top sports talk and analysis
- ✓ MLB\*, NBA, NHL\*, NCAA\* play-by-play

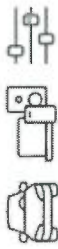
**GET SELECT**

#### All Access

**\$8.25** /mo for 12 Months

Then \$21.99 per month.

Fees and taxes apply. See Offer Details below.



Our widest variety of entertainment, with the power to customize it to you. [View Channel Lineup](#)

- ✓ 350+ channels to enjoy in your car, on your phone, at home, and online
- ✓ News, entertainment, comedy, and sports
- ✓ Ad-free music for every genre and decade, plus streaming channels for your party, workout, and more
- ✓ Thousands of shows and videos available on demand
- ✓ Top sports talk and analysis
- ✓ MLB\*, NBA, NHL\*, NCAA\* play-by-play
- ✓ NFL play-by-play and NASCAR\* races
- ✓ Create your own stations based on artists or songs you choose
- ✓ Two dedicated Howard Stern channels, including video

**GET ALL ACCESS**